

Application No.: 10/674,085

14

Docket No.: 188122003600

**REMARKS**

Claims 1-38 stand examined and are rejected on various grounds. These objections and rejections are addressed in the appropriate sections below. Claims 18, 31-33, 37, and 38 have been objected to by the Examiner.

In view of the preceding amendments and the remarks made herein, the present application is believed to be in condition for allowance.

**Response to Claim Objection**

Claim 19 has been objected to for failing to provide sufficient antecedent basis. Applicants have amended claim 19 to modify the objected limitation from "the component associated with each leaf of the group tree structure" to "each component associated with a leaf of the group tree structure." Applicants believe that amended Claim 19 has addressed the Examiner's objection.

**Response to Rejection under 35 U.S.C. § 112, Second Paragraph**

Claim 4 stands rejected under 35 U.S.C. § 112, second paragraph for allegedly being indefinite as failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicants have amended claim 4 to overcome this rejection.

**Response to Rejections under 35 U.S.C. § 102 (e)**

Claims 1-17, 24, 25, 27-30, 34-36 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication 20020184603 to Hassibi et al (hereinafter the Hassibi reference). Applicants respectfully traverse these rejections as to the amended claims.

Applicants have amended independent claims 1, 24, 27, 34, 35, and 36 to include the limitation of "a global symmetry line", which is not disclosed or taught by the Hassibi reference. The Figures 3-7 and their corresponding descriptions of the Hassibi reference teach a slicing

pa-1029474

Application No.: 10/674,085

15

Docket No.: 188122003600

method, both horizontally and vertically, to determine the boundaries of the circuit components to be used as layout constraints. The layout constraints are then used as posynomials in an algorithm taught by the Hassibi reference for generating a layout of the circuit. The Hassibi reference does not disclose the concept of using a global symmetry line to arrange the circuit components in a tree structure. For example, referring to Figure 4 and Figure 5 of Hassibi, the node 0 is used as the root node for its slicing method, which created the tree structure as shown in Figure 5. However, the overall layout is not symmetrical to node 0, which is also represented as line 40 in Figure 4. Similarly, referring to Figure 6 and Figure 7 of Hassibi, the node 0 is used as the root node for its slicing method, which created the tree structure as shown in Figure 7. Again, the overall layout is not symmetrical to node 0, which is also shown as line 60 in Figure 6.

On the contrary, the present invention employs a method of creating a tree structure according to a global symmetry line. As a result, the layout of the circuit components generated by this method is symmetrical to the global symmetry line. For example, in Figures 26 and 27, the layout of the circuit components is symmetrical to the global symmetry line 24. And in Figures 38 and 39, the layout of the circuit components is symmetrical to the global symmetry line 164. Therefore, Applicants respectfully submit that the Hassibi reference does not anticipate the present invention because it does not disclose the limitation of creating a tree structure according to a global symmetry line. For at least the reason stated above, Applicants believe the amended independent claims 1, 24, 27, 34, 35, and 36 and their corresponding dependent claims 2-18, 25-26, 28-33, and 37-38 are in condition for allowance.

#### **Allowable Subject Matter**

Applicants have amended claim 19 to include all the limitation of the base claim 1. Thus, claim 19 and its dependent claims 20-23 are in condition for allowance. The Examiner is thanked for identifying the allowable subject matter of claim 19 in the Office Action.

pa-1029474

Application No.: 10/674,085

16

Docket No.: 188122003600

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 188122003600. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

Dated: February 15, 2006

Respectfully submitted,

By 

Thomas Chan

Registration No.: 51,543  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, California 94304-1018  
(650) 813-5616

pa-1029474